

[Attorney list on signature page]

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA,  
SAN JOSE DIVISION

HYNIX SEMICONDUCTOR INC.; HYNIX  
SEMICONDUCTOR AMERICA, INC.; HYNIX  
SEMICONDUCTOR U.K. LTD.; and HYNIX  
SEMICONDUCTOR DEUTSCHLAND GmbH,

Plaintiff,

vs.

RAMBUS INC.,  
Defendant.

CASE NO. CV 00-20905 RMW

**[PROPOSED] ORDER REGARDING  
PRODUCTION OF MATERIALS  
SUBJECT TO PRIVILEGE PIERCING  
ORDERS IN RELATED CASES**

RAMBUS INC.,

Plaintiff,

v.

HYNIX SEMICONDUCTOR INC., HYNIX  
SEMICONDUCTOR AMERICA INC., HYNIX  
SEMICONDUCTOR MANUFACTURING  
AMERICA INC.,

SAMSUNG ELECTRONICS CO., LTD.,  
SAMSUNG ELECTRONICS AMERICA, INC.,  
SAMSUNG SEMICONDUCTOR, INC.,  
SAMSUNG AUSTIN SEMICONDUCTOR,  
L.P.,

NANYA TECHNOLOGY CORPORATION,  
NANYA TECHNOLOGY CORPORATION  
U.S.A.,

Defendants.

CASE NO. C 05-00334 RMW

1 RAMBUS INC.,

CASE NO. C 05 02298 RMW

2 Plaintiff,

3 v.

4 SAMSUNG ELECTRONICS CO., LTD.,  
5 SAMSUNG ELECTRONICS AMERICA, INC.,  
6 SAMSUNG SEMICONDUCTOR, INC.,  
7 SAMSUNG AUSTIN SEMICONDUCTOR,  
L.P.,

8 Defendants.

9 RAMBUS INC.,

CASE NO. C 06-00244 RMW

10 Plaintiff,

11 v.

12 MICRON TECHNOLOGY, INC., and MICRON  
SEMICONDUCTOR PRODUCTS, INC.,

13 Defendants.

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17 At the case management conference before the Court on August 3, 2007, Hynix  
18 Semiconductor Inc., Hynix Semiconductor America, Inc., Hynix Semiconductor U.K. Ltd., Hynix  
19 Semiconductor Deutschland GmbH, and Hynix Semiconductor Manufacturing America Inc.  
20 (collectively, "Hynix"), Samsung Electronics Co., Ltd., Samsung Electronics America, Inc.,  
21 Samsung Semiconductor, Inc., and Samsung Austin Semiconductor, L.P. (collectively,  
22 "Samsung,"), Nanya Technology Corporation and Nanya Technology Corporation U.S.A.  
23 (collectively, "Nanya"), and Micron Technology, Inc. and Micron Semiconductor Products, Inc.  
24 (collectively, "Micron") requested that the Court order Rambus Inc. ("Rambus") to produce all  
25 materials that Rambus has been ordered to produce pursuant to privilege piercing orders in *Hynix*  
26 *Semiconductor, Inc. et al. v. Rambus Inc.*, Civ. A. No. 00-20905 (N.D. Cal. filed Aug. 29, 2000)  
27 ("Hynix I case") and *Micron Technology, Inc. v. Rambus Inc.*, Civ. A. No. 00-792 (D. Del filed  
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1 Aug. 28, 2000) (“Micron Delaware case”) to the parties adverse to Rambus in each of the above-  
2 captioned cases to the extent it had not already done so. Rambus opposed this request. Having  
3 considered the parties’ arguments and good cause appearing,

4 IT IS HEREBY ORDERED that:

5 1. Rambus shall produce all materials that Rambus has been ordered to  
6 produce pursuant to privilege piercing orders in the Hynix I case to Hynix, Samsung, Nanya and  
7 Micron in each of the above-captioned cases to the extent it has not already done so, including  
8 without limitation the materials subject to the Court’s Orders dated February 26, 2004, January  
9 31, 2005, February 28, 2005, August 26, 2005, October 3, 2005, October 19, 2005, and October  
10 20, 2005, and all discovery and testimony taken in connection with such materials, including  
11 without limitation documents, interrogatory responses, deposition testimony and exhibits, trial  
12 testimony and exhibits, and declarations.

13 2. Rambus shall produce all materials that Rambus has been ordered to  
14 produce pursuant to privilege piercing orders in the Micron Delaware case to Hynix, Samsung,  
15 Nanya and Micron in each of the above-captioned cases to the extent it has not already done so,  
16 including without limitation the materials subject to the Court’s Orders dated May 16, 2001,  
17 February 10, 2006, and June 15, 2006, and all discovery and testimony taken in connection with  
18 such materials, including without limitation documents, interrogatory responses, deposition  
19 testimony and exhibits, trial testimony and exhibits, and declarations.

20 3. Rambus shall produce the materials identified above within 15 business  
21 days of entry of this Order without the need for further requests by Hynix, Samsung, Nanya or  
22 Micron.

23 4. By producing these materials in response to this Order, Rambus is not  
24 waiving any protection to which it is otherwise entitled under the attorney-client privilege or  
25 work product doctrine, and nothing in this Order shall preclude Rambus from challenging the  
26 admissibility of any documents or testimony at any trial on any basis, including without limitation  
27 on the basis of the attorney-client privilege and/or work product protection.  
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1 IT IS SO ORDERED.

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3 Dated: \_\_\_\_\_  
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Honorable Ronald M. Whyte  
United States District Court Judge  
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1 **APPROVED AS TO FORM:**

2 DATED: August 20, 2007 Respectfully submitted,

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23 DEUTSCHLAND GmbH

24  
25 **APPROVED ONLY AS TO FORM AND NOT AS TO CONTENT:**

26 DATED: August 20, 2007

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